Case 3:16-cv-00270-MMD-VPC Document 69 Filed 03/27/17 Page 1 of 3 Case 3:16-cv-00270-MMD-VPC Document 61 Filed 02/24/17 Page 1 of 3 RECEIVED FLED SERVED ON David B. Kaplan COUNSELPARTIES OF RECORD 1314-B Cave Rock Dr. 2 P.O. Box 1939 Zephyr Cove, NV 89448 3 (509) 263-4625 Email: Director@SOSforBiz.com CLERK US DISTRICT COURT DISTRICT OF NEVADA DEPUTY 5 DAVID B. KAPLAN, IN PRO PER 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA. 8 **NORTHERN DIVISION** 9 10 Case No.: 3:16-cv-00270-MMD-VPC SECURITIES AND EXCHANGE 11 COMMISSION. Honorable Valerie P. Cooke 12 Plaintiff. **UNOPPOSED MOTION FOR ENTRY OF** 13 AN ORDER GRANTING PRO SE VS. **DEFENDANT DAVID KAPLAN COURT** 14 DAVID B. KAPLAN, ESQ., **AUTHORIZATION TO REGISTER AS A** SYNCHRONIZED ORGANIZATIONAL FILER TO FILE DOCUMENTS 15 SOLUTIONS, LLC, ELECTRONICALLY; AND PROPOSED SYNCHRONIZED ORGANIZATIONAL 16 ORDER SOLUTIONS INTERNATIONAL, LTD. and MANNA INTERNATIONAL 17 ENTERPRISES, INC., DATE: February 24, 2017 18 Defendants, 19 and 20 LISA M. KAPLAN, THE WATER-WALKING 21 FOUNDATION, INC. and MANNA INVESTMENTS, LLC, 22 Relief Defendants. 23 24 Pro Se Defendant David B. Kaplan, Esq. ("Defendant") respectfully requests that the Court 25 enter an unopposed Order Granting Defendant authorization to register as a "Filer", pursuant to LRIC 2-1(b), so as to minimize costs of expedited filing in the future and to ensure maximum 26 efficiency to all Parties as the present litigation moves forward. Since as a licensed California 27 attorney, Defendant David B. Kaplan, Esq. already has PACER access, affording Defendant 28 Case No. 3:16-cv-00270-MMD-VPC - 1 -

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authorization to register as a "Filer" in the Court's jurisdiction would further the efficiency of this litigation.

The SEC does not oppose Defendant's request.

WHEREFORE, Defendant respectfully requests that the Court authorize pro se Defendant David B. Kaplan, Esq. to register as a "Filer" permitting future electronic filings with the court.

DATED: February 23, 2017

Respectfully Submitted

Pro Se

The Honorable Valerie P. Cooke United States Magistrate Judge

PROOF OF SERVICE

I am over the age of 18 years, and I am a party to this action. My business address is:

P.O. Box 1939, Zephyr Cove, NV 89448

On February 24, 2017, I caused to be served the document entitled UNOPPOSED MOTION FOR ENTRY OF AN ORDER GRANTING PRO SE DEFENDANT DAVID KAPLAN COURT AUTHORIZATION TO REGISTER AS A FILER TO FILE DOCUMENTS ELECTRONICALLY; AND PROPOSED ORDER on all parties to this action addressed as

stated on the service list below:

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the service list below.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 24, 2017

~

David B. Kaplan, Pro Se

SERVICE LIST

<u>-3-</u>

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